



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

November 6, 2024

By ECF

The Honorable Paul A. Engelmayer
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records v. USCIS*, 23 Civ. 1997 (PAE)

Dear Judge Engelmayer:

This Office represents United States Citizenship and Immigration Services (the “Government” or “Agency”), defendant in this action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552. We write respectfully to request a 7-day extension of the Government’s brief in further support of its motion to dismiss or for summary judgment and in opposition to plaintiffs’ cross-motion. The Government’s brief is currently due November 8. If the Court were to grant this request, the Government’s brief would be due November 15. The Government seeks this extension because its declarant is unexpectedly unavailable, and the Government requires additional time to discuss its response with the Agency. Plaintiffs consent to this request, provided that the deadline for their reply brief is similarly extended from the current deadline of November 27 until December 6.

This is the Government’s first request for an extension of the briefing deadlines. Plaintiffs previously requested two extensions of the deadline for their opposition brief, *see* ECF No. 43 and 45, which the Court granted, *see* ECF No. 44 and 46.

We thank the Court for its consideration of this request.

Respectfully,

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